



San Benito County Water District

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April 21, 2005

Kirk Rodgers, Regional Director
U. S. Bureau of Reclamation, Mid-Pacific Region
2800 Cottage Way, MP100
Sacramento, CA 95825

Re: Draft Municipal & Industrial Water Shortage Policy

Dear Mr. Rodgers:

San Benito County Water District has reviewed the draft Municipal & Industrial Water Shortage Policy and accompanying Draft Environmental Assessment, and appreciates this opportunity to comment on these documents.

You may recall that the District previously urged that an environmental analysis under NEPA be conducted on the proposed policy. We are gratified and satisfied that Reclamation has thoughtfully considered the impacts of the proposed Policy, and has made a good faith effort to consider potential alternative policies. While we may disagree with the conclusion of the Environmental Assessment that the impact of the Policy on irrigation allocations is "not a significant impact," we do believe that the nature and extent of the impact has been described and considered. The District's and its irrigators' understanding of potential impacts to agricultural supplies provides the opportunity to plan for conjunctive use, water banking, municipal wastewater recycling and other compensating strategies to minimize the significant social, economic, and environmental impacts that agricultural supply shortages will cause.

The other principal comment the District had to the previously-proposed Policy was that limitation of the Policy's protection to those future municipal demands projected in the 1994 CVP Ratebook was arbitrary and without adequate notice to the contractors. The currently proposed Policy relies instead on the projections of future municipal demand made by the contractors themselves in the more current and realistic "look forward" provided by the Water Needs Assessments on which the CVP Renewal Contracts are based. For the District, that "look forward" necessarily reflects inevitable urbanization as Santa Clara County's growing metropolitan influence creeps southward into San Benito County. It is our understanding, from reviewing the Policy and accompanying Environmental Assessment, that as municipal uses increase in San Benito County the proposed Policy would extend to as much as 16,276 acre feet of the District's CVP supply.

Thank you for the opportunity to comment on the Policy.

Sincerely,


John S. Gregg
District Manager/Engineer

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CODE	ACTION	SURNAME & DATE
8218	Ex	(831) 637-7267
500	✓	del
40	✓	copy to [unclear]
100	✓	FYI
105	✓	[unclear]

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